

Michael Murphy Equine Environmental Management Consulting  
P.O. Box 2705  
Sebastopol, CA 95473  
[m\\_murphy@sonic.net](mailto:m_murphy@sonic.net)  
michaelmurphyhomesandland.com  
707-332-1195

To: Laurie Taul  
From: Michael Murphy  
Subject: Comments and suggestions on the draft "General Waste Discharge Requirements for Confined Animal Facilities Within the San Francisco Bay Region"  
Date: April 29, 2016

Thank you for giving me the opportunity to review and comment on the draft document. Thank you also for taking the time to have the workshop in Petaluma on April 18. This is the second time I have made comments to the draft document and my first comments will still be relevant.

I have read David Lewis comments and feel that his statement concerning the time line for CAF's that have never been regulated is correct; expecting quick compliance is a little extreme. I represent the equine industry that has never had any regulation except the local county zoning and use permits. Most equine owners are good stewards of the land. It has been my observation that at present, a horse owner will become noticed by the Water Quality, only after a complaint has been filed. It will be very difficult for horse ranchers to comply with documentation, monitoring, BMPs, and additional fees when they have never been exposed to them.

The dairies have had to comply with these rules and standards for years and have had access to grants and funds provided by NRCS, RCDs, and the Department of Agriculture. I would like to see the Equine industry be able to apply for assistance, grants, and other opportunities that apply to other agricultural producers. Since the State Water Quality is

placing Equines under the new CAF's regulations this should now mean that the State now recognizes Equines as a vital part of Agriculture and eligible for the funding available to other agriculture sectors to defray the cost of implementing environmental improvements to ensure the best Water Quality for California.

The dairies also have a program called Dairy Quality Assurance Program that allows them to within their industry to teach and supplement facilities with professional assistance and resources for them to satisfy the requirements of a Waste Discharge Waiver or permit. I would like to suggest such a program be started through the Sonoma County Horse Council and the Santa Rosa Junior College Equine Studies Facility that would allow the equine the same reduced fee and the ability to comply by assistance given by a peer group.

As far as grazing permits, I do not feel this is necessary unless a facility is bordering a body of water. This issue should be dealt with in workshops and education.